

UNITED STATES DISTRICT COURT  
for the  
Western District of Texas

**FILED**

April 14, 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America  
v.  
Raul Ical  
AKA Raymundo Caal-Caal  
XXX XXX 604

)

Case No. **SA:25-MJ-593**BY: AC  
DEPUTY*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2025 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

8 U.S.C. § 1326(a)      Illegal Reentry

Penalties: Maximum Penalties: 2 years confinement, \$250,000 Fine or  
Both; 1 year supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Sworn to before me and signed in my presence.  
 Sworn to telephonically and signed electronically.

Date: April 14, 2025

City and state: San Antonio, Texas

**MICHAEL N DRYJA**   
Digitally signed by MICHAEL N  
DRYJA  
Date: 2025.04.14 09:29:37 -05'00'

*Complainant's signature*

Michael Dryja, Deportation Officer

*Printed name and title*

  
*Judge's signature*

Honorable Henry J. Bemporad, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT

Being duly sworn, I declare that the following is true and correct to the best of my knowledge.

My name is Michael Dryja and I am a Deportation Officer with Immigration and Customs Enforcement (ICE) and with whom I have been employed since January 3, 1999. I am authorized by the United States Department of Homeland Security to enforce the Immigration Laws and Regulations of the United States or any other Laws or Regulations designated by the Attorney General or his successor, the Secretary of the Department of Homeland Security.

On or about April 16, 2024, Raul Ical (hereafter ICAL) a native and citizen of Guatemala who was previously removed from the United States to Guatemala, came to the attention of ICE. In April of 2024, ICAL was arrested for Driving While Intoxicated in San Antonio, Texas. ICAL was released on bond prior to an immigration detainer being placed.

ICE/ERO officers conducted an investigation to determine if ICAL received permission to re-enter the United States, which included conducting Immigration database query's which confirmed that ICAL is in the United States without authorization.

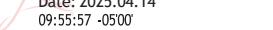
Databases revealed that ICAL is a national and citizen of Guatemala with assigned alien registration number AXXX XXX 604 in the Enforce Alien Removal Module (EARM), a Department of Homeland Security database. EARM revealed that ICAL is an alien who has been previously removed from the United States to Guatemala on or about April 24, 2013.

On April 14, 2025, ICE officers with assistance from Texas Department of Public Safety (DPS) Agents conducted physical surveillance of the target address in San Antonio that was discovered during record checks, which is located within the Western District of Texas. Officers observed an adult male matching the photograph and physical description of ICAL exit the residence at approximately 0840 and place equipment into a vehicle parked on street in front of residence.

Officers approached ICAL and were within ten to fifteen feet of him, as he was standing in his front yard. ICAL observed officers and immediately fled on foot into his home. Officers immediately surrounded the home and called him out, ICAL refused to come out. Officers have maintained a perimeter around the residence.

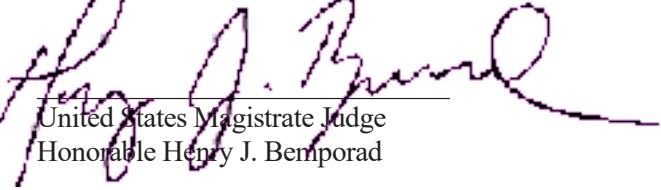
Immigration databases also revealed that ICAL has not been granted permission to reapply for admission from the Attorney General of the United States, or his successor, after deportation/removal.

Based on the following facts, there is probable cause to believe that ICAL has illegally re-entered the United States in violation of Title 8 United States Code, Section 1326(a).

**MICHAEL N** Digitally signed by  
DRYJA   
Date: 2025.04.14  
09:55:57 -05'00'

Michael Dryja  
Deportation Officer  
Immigration and Customs Enforcement

Subscribed and sworn telephonically on April 14, 2025.

  
United States Magistrate Judge  
Honorable Henry J. Bemporad